

**REMARKS**

This response is in reply to the Office Action dated November 9, 2005. The examiner indicated that claims 1 through 26 pending in the application are each rejected under 35 U.S.C. 102(a) as being anticipated by U.S. Patent Application Publication 2003/0068173 (hereinafter Tanizaki). As illustrated in Figures 9 and 10, Tanizaki comprises an image forming device having plurality of developer members mounted within a main body. A cabinet containing a plurality of photoconductive members is separately attached to the main body such that the photoconductive members can be inserted into contact with the developer units. The cabinet is pivotally attached to the main body at a first connection point. A door is pivotable mounted on the exterior of the body and includes a plurality of transfer members. The door is pivotally attached to the main body at a second connection point. The door is pivotable between an open position to gain access to the cabinet and the closed position to prevent access.

The present invention includes a subunit that is pivotally attached to the door. A photoconductive member is mounted to the subunit with both moving about a single contact point between open and closed orientations. Tanizaki discloses the cabinet and the door being two separate features that are individually attached to the main body.

Claim 1 has been amended to now include that the subunit includes a transport belt. The plurality of photoconductive members remain in contact with the transport belt as the subunit and plurality of photoconductive members move between orientations. Tanizaki does not disclose the photoconductive members remaining in contact with a transport belt as the cabinet moves relative to the main body. Further, Tanizaki does not disclose the photoconductive members and a subunit including a transport belt moving about a common point. First, the door or Tanizaki does not include a transport belt. Second, the door moves about a different point than the cabinet that includes the photoconductive members. Therefore,

claim 1, and dependent claims 2-7 are patentable over this reference and are in condition for allowance.

Claim 9 has been amended to now include a transport belt mounted on the subunit with the photoconductive members remaining in contact with the transport belt and each being movable about a common point. Tanizaki does not disclose the subunit including a transport belt with the photoconductive members remaining in contact with the transport belt during movement between the orientations. Tanizaki does not disclose a transport belt mounted on the door, and the photoconductive members do not remain in contact with the transport belt during movement. Further, the door and the photoconductive members do not move about a common point. Therefore, claim 9 and dependent claims 10-13 are in condition for allowance.

Claim 14 has been amended to now include that the second units that include a photoconductive member are mounted to the subunit, and that the subunit forms an exterior wall of the main body when the subunit is in the image formation orientation. The photoconductive member of Tanizaki mounts to the cabinet that is positioned within an interior section of the main body. The photoconductive member is not mounted to the door that forms the exterior wall. Therefore, claim 14 and dependent claim 15 are in condition for allowance.

Claim 16 has been amended to now include that the plurality of photoconductive members and a transport belt are mounted on the subunit and remain in contact during both the image forming and open orientations. Tanizaki discloses the cabinet with the attached photoconductive members does not include a transport belt. Therefore, claim 16 and dependent claim 17 is in condition for allowance.

Claim 18 has been amended to now include that the subunit includes a transport belt, and the subunit and the second unit with the photoconductive member are movable about a common point when moved between orientations. The cabinet where the photoconductive drums are mounted in Tanizaki does not include a transport belt. Further, the door with the

transfer members moves about a different point than the cabinet. Therefore, claim 18 and dependent claim 19 are in condition for allowance.

Claim 20 has been amended to now include that subunit to which a photoconductive member is mounted forms an exterior section of the device, and the subunit with the photoconductive member move about a common pivot point. The door of Tanizaki that forms the exterior of the device does not receive the photoconductive members. Further, the cabinet that receives the photoconductive members does not form an exterior section of the device. Therefore, claim 20, and dependent claims 21-22 are in condition for allowance.

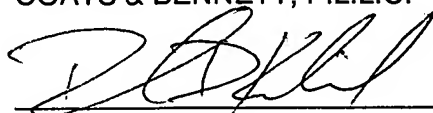
Claim 23 has been amended to now include the subunit includes a transport belt, and a step includes moving the subunit with the photoconductive member about a common pivot point. Further, the subunit forms an exterior section of the device when moved to the second orientation. Neither of these concepts are disclosed in Tanizaki and therefore claim 23 and dependent claim 24 is in condition for allowance.

Claim 25 has been amended to now include connecting a photoconductive member with a transport belt on the subunit and moving the subunit to a second orientation to form a section of the exterior of the device. This concept is not disclosed in Tanizaki and claim 25 and dependent claim 26 are in condition for allowance.

In view of the above amendments and remarks, the application is currently in condition for allowance and such action is respectfully requested. If any issues remain unresolved, the undersigned attorney requests a telephone interview to expedite allowance and issuance.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'D. Kalish', is written over a horizontal line.

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